

REMARKS

Claims 97-101, 110, 114 and 115 have been amended to improve form. Claims 97-115 remain pending in this application.

Claims 97-115 have been rejected under 35 U.S.C. § 112, second paragraph as being indefinite. More particularly, the Office Action states that the terms “the result,” “said customers web browser,” “the routing” and “said network traffic” in claims 97, 110 and 115 lack antecedent basis (Office Action – page 2). Claims 97, 110 and 115 have hereby been amended to address the issues noted. Accordingly, withdrawal of the rejection of claims 97-115 under 35 U.S.C. § 112, second paragraph is respectfully requested.

Claims 97-115 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Cohn et al. (U.S. Patent No. 6,411,684; hereinafter Cohn). The rejection is respectfully traversed.

As to claim 97, the Office Action states that Cohn discloses each of the features of claim 97 and generally points to Figs. 1-3, 6, 10 and 13; col. 4, line 13 to col. 5, line 35; col. 18, lines 23-60; and col.19, line 18 to col. 20, line 50 (Office Action – pages 3-4). The applicants initially note that the Office Action does not particularly point out where each particular feature of claim 97 is allegedly disclosed by Cohn. The applicants respectfully request that any subsequent communication particularly point out which of the cited portions of Cohn allegedly disclose the particular features of claim 97 to enable the applicants to more clearly understand the pending rejection. In any event, Cohn does not disclose or suggest each of the features of claim 97.

For example, claim 97 recites that the plurality of system resources include a network manager which manages routing of the customer’s traffic over the communications network, and a view application to review network traffic, said network manager and said

view application responsive to proxy requests from said dispatch server to enable the customer to command and control switched voice traffic resources and switched data traffic resources provided by the enterprise to the customer.

Cohn at col. 4, lines 13 to col. 5, line 35 discloses that network hubs may be used to distribute mass mailings of message traffic, deliver compound messages that comprise information of more than one media and to translate messages between different languages to accommodate foreign speaking users. This portion of Cohn does not disclose or suggest a network manager which manages routing of the customer's traffic over the communications network, and a view application to review network traffic, said network manager and said view application responsive to proxy requests from said dispatch server to enable the customer to command and control switched voice traffic resources and switched data traffic resources provided by the enterprise to the customer, as recited in claim 97.

Cohn at col. 18, lines 23-60 discloses that message router 72 includes a hub controller 138 and a database query engine 140 and that the message router 72 determines the next destination for each message passing through the network hub. This portion of Cohn also discloses that message router 72 prioritizes messages by attaching an internal priority to each message. This portion of Cohn does not disclose or suggest a network manager which manages routing of the customer's traffic over the communications network, and a view application to review network traffic, said network manager and said view application responsive to proxy requests from said dispatch server to enable the customer to command and control switched voice traffic resources and switched data traffic resources provided by the enterprise to the customer, as recited in claim 97.

Cohn at col. 19, line 18 to col. 20, line 50 discloses that connection manager 74 controls connections between each network hub, the network center 37 and each messaging

system. This portion of Cohn also discloses that connection manager 74 maintains the connection queue 141 where each connection queue record is marked with an overall priority indication. The priority indications are immediate, high and normal (Cohn - col. 19, lines 20-60). This portion of Cohn also discloses that once a connection is established and the high priority messages are sent, other messages may be sent if the load on the connection permits and that the connection manager 74 will open a connection if a connection is free and there are no remaining normal, high or immediate priority connections required (Col. 19, line 60 to col. 20, line 6). This portion of Cohn further discloses that administrative event manager 78 handles administrative events and includes a hub controller 138 and a database query engine 140 (Cohn – col. 20, lines 7-50).

This portion of Cohn, however, does not disclose or suggest a network manager which manages routing of the customer's traffic over the communications network, and a view application to review network traffic, said network manager and said view application responsive to proxy requests from said dispatch server to enable the customer to command and control switched voice traffic resources and switched data traffic resources provided by the enterprise to the customer, as recited in claim 97.

In addition, none of Figs. 1-3, 6, 10 and 13 discloses or suggests these features of claim 97. In fact, Cohn is not at all related to managing routing of the customer's traffic or providing a view application to review the network traffic, much less a network manager and view application that are responsive to proxy requests from a dispatch server to enable the customer to command and control switched voice traffic resources and switched data traffic resources provided by an enterprise to a customer, as required by claim 97

For at least these reasons, Cohn does not disclose or suggest each of the features of claim 97. Accordingly, withdrawal of the rejection and allowance of claim 97 are respectfully requested.

Claims 98-109 are dependent on claim 97 and are believed to be allowable for at least the reasons claim 97 is allowable. In addition, these claims recite additional features not disclosed or suggested by Cohn.

For example, claim 98, as amended, recites that the switched voice traffic resources include switched toll free voice traffic resources and said network manager includes a toll free network manager application responsive to proxy requests from said dispatch server to enable the customer to command and control routing of switched toll free voice traffic.

The Office Action points to the same portions of discussed above as allegedly disclosing the features of claim 98 (Office Action – page 4). These portions of Cohn, however, do not disclose a toll free network manager application responsive to proxy requests from a dispatch server to enable the customer to command and control routing of switched toll free voice traffic, as required by amended claim 98. In fact, Cohn does not even mention switched toll free voice traffic.

Claim 100, as amended, recites that the network manager includes an outbound network manager responsive to proxy requests from said dispatch server to enable the customer to command and control switched toll traffic. Similar to the discussion above with respect to claim 98, Cohn does not mention switched toll traffic, much less a network manager responsive to proxy requests from a dispatch server to enable the customer to command and control switched toll traffic, as required by amended claim 100.

For at least these additional reasons, withdrawal of the rejection and allowance of claims 98 and 100 are respectfully requested.

Claim 99, as amended, recites that the switched voice traffic resources include switched call center voice traffic resources and said network manager includes a call manager application responsive to proxy requests from said dispatch server to enable the customer to command and control routing of switched voice traffic between call centers.

The Office Action points to the same portions of Cohn discussed above (i.e., Figs. 1-3, 6, 10 and 13 along with col. 4, line 13 to col. 5, line 35, col. 18, lines 23-60, col. 19, line 18 to col. 20, line 50) as allegedly disclosing the features of claim 99 (Office Action – page 4). These portions of Cohn have been discussed above. None of these portions of Cohn, or any other portions of Cohn, even mentions call centers, much less a call manager application responsive to proxy requests from a dispatch server to enable the customer to command and control the routing of switched voice traffic between call centers, as required by amended claim 99.

For at least these reasons, Cohn does not disclose or suggest each of the features of claim 99. Accordingly, withdrawal of the rejection and allowance of claim 99 are respectfully requested.

As to claim 110, the Office Action states that Cohn discloses each of the features of claim 110 and generally points to Figs. 1-3, 6, 10 and 13; col. 4, line 13 to col. 5, line 35; col. 18, lines 23-60; and col.19, line 18 to col. 20, line 50 (Office Action – page 8). Similar to the discussion above with respect to claim 97, the applicants respectfully request that any subsequent communication particularly point out which of the cited portions of Cohn allegedly disclose the particular features of claim 110 to enable the applicants to more clearly understand the pending rejection. In any event, Cohn does not disclose or suggest each of the features of claim 110.

For example, claim 110 recites that the plurality of system resources include a toll free network manager which manages routing of the customer's toll free voice traffic over the communications network, and a real time monitor which provides near real time monitoring of network traffic, said toll free network manager and said real time monitor responsive to proxy requests from said dispatch server to enable the customer to manage the communications network resources provided by the enterprise to the customer in near real time.

The portions of Cohn referenced in the Office Action have been discussed above. None of these portions of Cohn, or any other portions, discloses or suggests including a toll free network manager which manages routing of the customer's toll free voice traffic over the communications network, and a real time monitor which provides near real time monitoring of network traffic, much less that the toll free network manager and the real time monitor are responsive to proxy requests from said dispatch server to enable the customer to manage the communications network resources provided by the enterprise to the customer in near real time, as required by claim 110.

For at least these reasons, Cohn does not disclose or suggest each of the features of claim 110. Accordingly, withdrawal of the rejection and allowance of claim 110 are respectfully requested.

Claims 111-114 are dependent on claim 110 and are believed to be allowable for at least the reasons claim 110 is allowable. In addition, these claims recite additional features not disclosed or suggested by Cohn.

For example, claim 111 recites that the system further includes a single order entry application as one of said plurality of system resources, wherein said order entry application enables a customer to identify and authenticate a plurality of users with distinct toll free call

manager entitlements, and to modify said entitlements from a single point of customer identification and authentication.

The Office Action states that Cohn discloses these features and generally points to Figs. 1-3, 6, 10 and 13 along with col. 4, line 13 to col. 5, line 35; col. 18, lines 23-60; and col. 19, line 18 to col. 20, line 50 (Office Action – page 8). These portions of Cohn have been discussed above. None of these portions of Cohn is at all related to an order entry application, much less an order entry application to enable a customer to identify and authenticate a plurality of users with distinct toll free call manager entitlements, and to modify said entitlements from a single point of customer identification and authentication, as required by claim 111.

For at least these additional reasons, withdrawal of the rejection and allowance of claim 111 are respectfully requested.

As to claim 115, the Office Action states that Cohn discloses each of the features of claim 115 and generally points to the same portions of Cohn discussed above with respect to claim 97 (i.e., Figs. 1-3, 6, 10 and 13; col. 4, line 13 to col. 5, line 35; col. 18, lines 23-60; and col.19, line 18 to col. 20, line 50) (Office Action – pages 3-4). Similar to the discussion above with respect to claim 97, the applicants respectfully request that any subsequent communication particularly point out which of the cited portions of Cohn allegedly disclose the particular features of claim 115 or withdraw the rejection. In any event, Cohn does not disclose or suggest each of the features of claim 115.

For example, claim 115 recites that the method includes providing said plurality of system resources, said system resources including a network manager which manages routing of the customer's switched voice traffic and switched data traffic over the communications network, and a view application to review network traffic, said network

manager and said view application responsive to proxy requests from said dispatch server to enable the customer to command and control the communications network resources provided by the enterprise to the customer.

Similar to the discussion above with respect to claim 97, none of these portions of Cohn referenced in the Office Action, or any other portions, discloses or suggests including a network manager which manages routing of the customer's switched voice traffic and switched data traffic over the communications network, and a view application to review network traffic, much less that the network manager and the view application are responsive to proxy requests from said dispatch server to enable the customer to command and control the communications network resources provided by the enterprise to the customer, as required by claim 115.

For at least these reasons, Cohn does not disclose or suggest each of the features of claim 115. Accordingly, withdrawal of the rejection and allowance of claim 115 are respectfully requested.

CONCLUSION

In view of the foregoing amendments and remarks, the applicants respectfully request withdrawal of the outstanding rejections and the timely allowance of this application. In addition, as the applicants' remarks with respect to the Examiner's rejection are sufficient to overcome this rejection, the applicants' silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art) is not a concession by the applicants that such assertions are accurate or such requirements have been met, and the applicants reserve the right to analyze and dispute such in the future.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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